

NPDES Inspection Report

Permit # WAR003375

IKO Pacific, Inc.

Sumas, WA

October 7, 2015

Prepared by:

Matt Vojik

**Environmental Protection Agency, Region 10
Office of Compliance and Enforcement (OCE)
Inspection and Enforcement Management Unit (IEMU)**

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I. Facility Information

Facility Name: IKO Pacific, Inc.

Facility Owner/Operator: IKO Pacific, Inc.

Facility/Mailing Address: 580 West Front Street, Sumas, WA 98295

Lat/Long: 48.992937°, -122.280574°

NPDES Permit: WAR003375

Receiving Water: Johnson Creek

NAICS Code: 324122 – Asphalt Shingle and Coating Materials
Manufacturing

Facility Contacts: Nick Nachbar, Plant Manager
Office: 360-988-9103 ext. 5710
Cell: 360-318-6322
Email: nick.nachbar@iko.com

Ben Belcher, Plant Engineer
Phone: 360-988-9103 ext. 5714
Fax: 360-988-0504
Email: ben.belcher@iko.com

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Ben Belcher or from observations during the inspection.)

II. Inspection Information

Inspection Date: October 7, 2015

Inspectors: Matt Vojik, Inspector
EPA Region 10, OCE / IEMU
Phone: 206-553-0716

Brian Levo, Inspector
EPA Region 10, OCE / IEMU
Phone: 206-553-1816

Arrival Time: 8:45 AM

Departure Time: 2:20 PM

Weather:	Rainy
Purpose:	To determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES).

III. Permit Information

This facility is permitted under the Washington State Department of Ecology (Ecology) Industrial Stormwater General Permit (ISGP), with the permit number WAR003375. The current permit became effective on January 2, 2015 and has an expiration date of December 31, 2019. According to Ecology's Water Quality Permitting and Reporting Information System (PARIS), the facility first obtained coverage under the ISGP on October 12, 1998.

IV. Background

IKO Pacific is a Canadian company, which owns seven facilities in North America. IKO Pacific has operated in the Sumas, WA location since 1998. This facility occupies approximately 21 acres and manufactures asphalt roofing products. Eleven above-ground storage tanks contain materials such as asphalt, modified asphalt flux, ferrous chloride, and process oil. Asphalt and asphalt flux are delivered via train cars and pumped into the storage tanks from the train unloading area on the north side of the property. Outdoor industrial activities also include limestone crushing and the storage of finished products.

The facility employs approximately 75 staff at this location. Mr. Ben Belcher has worked at the facility since 2009. Due to the recent departure of the previous plant engineer, Mr. Belcher had been the plant engineer for one day at the time of the inspection.

The facility maintains four outfalls, which discharge to a drainage ditch that flows to Johnson Creek, which flows to the Sumas River. A vicinity map appears in **Attachment A**.

V. Inspection Chronology

This was an unannounced inspection. We arrived at the facility at 8:45am on October 7, 2015 and presented our credentials to Mr. Nick Nachbar and Mr. Belcher. We convened in a conference room where held an opening conference. We discussed the purpose and scope of the inspection and I provided Mr. Nachbar and Mr. Belcher with an EPA Small Business Resources Information Sheet. We took a tour of the facility and conducted a records review. We concluded the inspection with a closing conference to discuss observations and next steps. We departed the facility at 2:20pm.

We were accompanied throughout the inspection by Mr. Belcher. We were not denied access to the facility.

VI. Records Review

We conducted a review of the following records.

- **Discharge Monitoring Reports (DMRs)** – Mr. Belcher presented copies of DMRs, analytical reports and chain-of-custody records for the past five years. Based on our review of the DMRs and data from Ecology’s PARIS database, we noted the following quarters in which benchmarks were exceeded:

Table 1: Summary of Benchmark Exceedances

Year	Parameter	Quarter	Benchmark	DMR Value	Units
2015	Turbidity	Q4	25	35	NTU
		Q3	25	87	NTU
	Copper	Q3	19.9	14	ug/L
2012	Turbidity	Q1	25	26	NTU
2011	Turbidity	Q1	77	26	NTU
	Copper	Q1	15	14	ug/L

- **Stormwater Pollution Prevention Plan (SWPPP)** – Mr. Belcher presented a copy of the SWPPP, which was dated October 2013. A scanned copy of the SWPPP is saved to the CD in **Attachment C**.
- **Oil Spill Prevention Control and Countermeasure (SPCC) Plan** – Mr. Belcher presented a copy of the SPCC Plan, which was dated October 2010. He said that the facility was in the process of revising this document.
- **Annual Reports** – Prior to the inspection, I reviewed a copy of the facility’s 2010 annual report, which was the only annual report available on Ecology’s PARIS database. The facility did not have additional annual reports on file at the time of the inspection.
- **Visual Inspection Reports** – Mr. Belcher presented records of monthly visual inspections conducted from October 2010 to June 2015.
- **Training Records** – Mr. Belcher presented a monthly training plan for 2015 as well as records of training on the subject of the facility’s “Emergency Safety Plan, Radiation Safety, Ladder Safety and Environmental Policy.” Copies of these training records appear in **Attachment D**.

VII. Site Review

Mr. Belcher took us on a tour of the facility. A site map and aerial image appear in **Attachment A**. A photograph log appears in **Attachment B**.

We inspected areas in the southwest portion of the facility where finished shingles (**Photo 1**), gravel and crushed limestone (**Photo 2**) were stored outdoors. In this area, we observed an uncovered dumpster (**Photo 1**) used to collect metal for recycling. To the northwest of the limestone storage area, we observed a storm drain receiving turbid stormwater (**Photo 3**). We noted that storm drains throughout the facility were equipped with filters. Mr. Belcher said that the facility inspects and maintains storm drain filters on a monthly basis.

We inspected the truck unloading area on the east side of the tank farm. We observed a partially open dumpster and sheen on the pavement (**Photo 4**). In this area we also inspected an oil/water separator. Mr. Belcher said that BAI Environmental Services performs annual maintenance on the oil/water separator. Upstream of the oil/water separator, we observed a storm drain receiving turbid stormwater (**Photo 5**). We inspected the ferrous chloride unloading station, where we observed evidence of corrosion on the containment wall of the tank farm (**Photo 6**).

Along the northern boundary of the facility we inspected the train unloading area, where we observed uncovered buckets of spilled asphalt material (**Photos 7-9**). We also observed a parts washer and oily pieces of equipment stored outside along the concrete containment wall of the tank farm (**Photo 10**).

Within the tank farm containment area, we observed drums of oil and cleaning products (**Photo 11**) with exposure to stormwater. Mr. Belcher explained that runoff from this area enters a sump (**Photo 12**). He said that sumps within the tank farm containment area are manually pumped to the oil/water separator in the truck unloading area.

On the east side of the facility we inspected a warehouse, which had recently been expanded to enclose old stormwater drains (**Photo 13**). I asked if these floor drains are still connected to the stormwater collection system and whether process wastewater enters these drains. Mr. Belcher said that the floors are swept clean and that process wastewater is not generated in this area. In an email on October 21, 2015 (**Attachment E**), Mr. Belcher confirmed that the floor drains had been disconnected from the stormwater system.

In the southeast corner of the facility, we observed sheen on the pavement (**Photo 14**) in the area that drains to a bioswale (**Photo 15**) upstream of sampling point #3. We inspected additional stormwater conveyances, which included a vegetated drainage ditch (**Photo 16**) upstream of sampling point #2 (**Photo 17**) and the stormwater detention pond (**Photo 18**) upstream of sampling point #1. The facility delivers samples to Avocet Environmental Testing in Bellingham, WA for analysis.

VIII. Areas of Concern

We noted the following areas of concern:

A. Missing Annual Reports

Section S9.B.1. of the ISGP states that “the Permittee shall submit a complete and accurate Annual Report to the Department of Ecology no later than May 15th of each year.”

AND

Section 9.2.1 of the SWPPP states that “a complete and accurate Annual Report shall be submitted to the Department of Ecology no later than May 15th of each year.”

Prior to the inspection, I reviewed a copy of the facility’s 2010 annual report, which was the only annual report available on Ecology’s PARIS database. At the time of the inspection, the facility could not find documentation to show that annual reports for 2011 through 2014 had been prepared or submitted to Ecology.

B. Employee Training

Section S3.B.4.b.i.5) of the ISGP states that “the SWPPP shall include BMPs to provide SWPPP training for employees who have duties in areas of industrial activities subject to this permit.”

AND

Section 5.1.5 of the SWPPP states that “a formal training session will be conducted by the SWPPP Team for all personnel who have duties that may be affected by the provisions of the General Permit. Training will be conducted annually, unless conditions or personnel changes indicate that more frequent training is necessary. The affected employees will be made aware of the purpose and contents of the SWPPP. The training sessions will include information regarding preventive maintenance procedures, good housekeeping practices, inspections, material management, and actions to prevent and respond to accidental spills at the property.”

During the inspection, Mr. Belcher presented a monthly training plan for 2015 as well as records of training on the subject of the facility’s “Emergency Safety Plan, Radiation Safety, Ladder Safety and Environmental Policy.” However, we noted that these training documents did not specifically address the purpose and contents of the SWPPP. Copies of these training documents appear in **Attachment D**.

C. SWPPP Certification

Section S3.A.6. of the ISGP states that “the Permittee shall sign and certify all SWPPPs in accordance with General Condition G2.”

During the inspection, we noted that the SWPPP was not signed and certified. In an email on October 21, 2015 (**Attachment E**), Mr. Belcher provided a copy of the SWPPP certification page, which was signed after the inspection on October 9, 2015.

D. Documentation of Monthly Site Inspections

Section S7.C. of the ISGP states that “the Permittee shall record the results of each inspection in an inspection report or checklist and keep the records on-site, as part of the SWPPP.”

During the inspection, the facility was not able to provide monthly site inspection records for July, August and September of 2015. Mr. Belcher said that the facility recently converted their reporting systems to a digital format and these inspection reports may have been misplaced in the process.

E. Certification of Monthly Site Inspections

Section S7.C.1.f. of the ISGP states that monthly site inspection records shall include “certification and signature of the person described in Condition G2.A, or a duly authorized representative of the *facility*, in accordance with Condition G2.B and D.”

During the inspection, we noted that the monthly site inspection records for the first and second quarters of 2015 did not include certification statements in accordance with Condition G2.D of the ISGP. Mr. Belcher said that the facility recently converted their reporting systems to a digital format, which may account for these missing certifications.

F. Good Housekeeping

Section S3.B.4.b.i.2) of the ISGP states that best management practices (BMPs) shall include “Good Housekeeping: The SWPPP shall include BMPs that define ongoing maintenance and cleanup, as appropriate, of areas which may contribute *pollutants* to *stormwater* discharges.”

AND

Section 5.1.2 of the SWPPP states that “good housekeeping procedures consist of regular inspection of onsite areas exposed to precipitation or stormwater runoff, as well as cleaning and clearing of any accumulation of debris, fluids, or contaminants that could contribute pollutants to stormwater. Recommended good housekeeping practices include the following: Promptly contain and clean up solid and liquid pollutant leaks and spills including oils, solvents, fuels, and dust from manufacturing operations on any exposed soil, vegetation, or paved area.”

In the vicinity of the train unloading area along the northern boundary of the facility, we noted a few areas where debris or contaminants could contribute pollutants to stormwater. We observed uncovered buckets of spilled asphalt material (**Photos 7-9**). We also observed stained concrete where a parts washer and oily pieces of equipment were stored along the containment wall of the tank farm (**Photo 10**). We suggested that the facility consider practices for containing or cleaning up contaminants in the train unloading area.

G. Uncovered Dumpsters

Section S3.B.4.b.i.2)d) of the ISGP states that the permittee shall “keep all dumpsters under cover or fit with a lid that must remain closed when not in use.”

During the inspection, we observed one dumpster left uncovered while not in use (**Photo 1**) and one dumpster left partially uncovered while not in use (**Photo 4**).

H. Sample Holding Time and Preservation Temperatures

Section S4.C. of the ISGP states that “the Permittee shall ensure that analytical methods used to meet the sampling requirements in this permit conform to the latest revision of the *Guidelines Establishing Test Procedures for the Analysis of Pollutants* contained in 40 CFR Part 136,” which specifies a 15 minute holding time for pH analysis and a preservation temperatures less than or equal to 6°C for parameters such as turbidity and oil and grease.

Analysis for pH is conducted by Avocet Environmental Testing in Bellingham, WA. We noted that the analytical reports indicated that the samples were noted received within a holding time of 15 minutes. We also noted that chain of custody records indicated that sample preservation temperatures exceeded 6°C for samples collected on March 2, 2011 and July 23, 2012.

After the inspection in an email on October 21, 2015 (**Attachment E**), Mr. Belcher stated that the facility ordered a pH meter to analyze samples in the field.

IX. Closing Conference

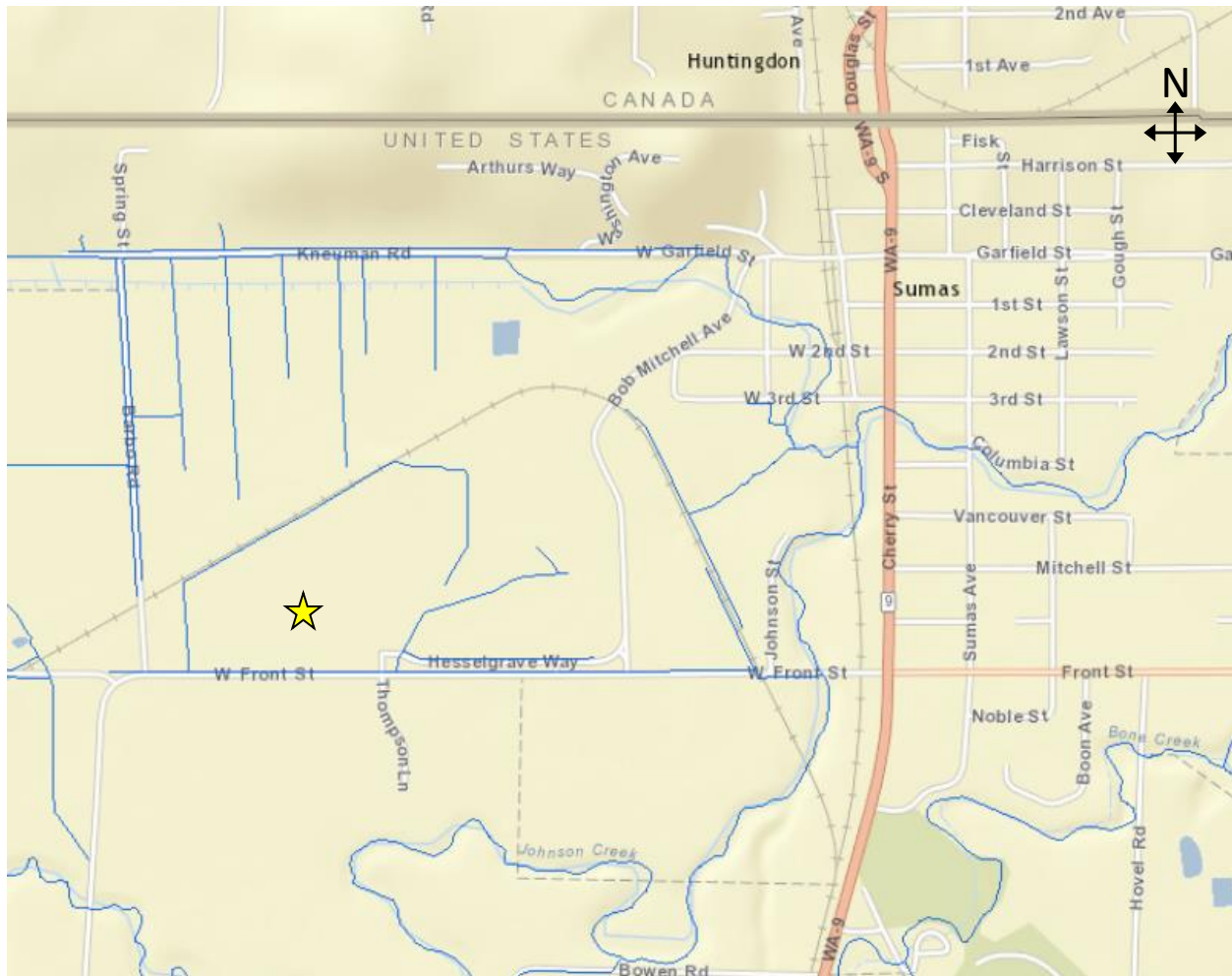
We held a closing conference with Mr. Nachbar and Mr. Belcher. We discussed the areas of concern identified during the inspection and gave a brief overview of the post-inspection process. We thanked them for their time and assistance.

Report Completion Date:

February 12, 2016

Lead Inspector Signature:

ATTACHMENT A – Maps: Site Plan, Vicinity Map & Aerial Image



Vicinity Map Obtained from Ecology's Water Quality Assessment Map Tool

<https://fortress.wa.gov/ecy/wqamapviewer/default.aspx?res=1768x1105>

(The facility location is indicated by a yellow star.)



Aerial Image Obtained from Google Earth

ATTACHMENT B – Photograph Log



Photo 1 / SI850222 – Eastern view of a red uncovered dumpster in the southwest portion of the facility. This is a cropped version of the original photograph.



Photo 2 / SI850221 - Northeast view of the limestone storage area.



Photo 3 / SI850225 – View of a storm drain located northeast of the limestone storage area.



Photo 4 / SI850189 – Southwesterly view of the truck unloading area and tank farm. A green dumpster with a partially open lid appears near the center of the photograph. The yellow arrow indicates the location of sheen on the pavement in the foreground.



Photo 5 / SI850196 – Stormwater drain immediately upstream of the oil-water separator located north of the truck unloading area.



Photo 6 / SI850202 – Southwesterly view of the ferrous chloride unloading station located near the tank farm. Rust discoloration appears along the wall and a storm drain appears on the left.



Photo 7 / SI850191 – Northerly view of the train unloading area along the northern boundary of the facility. White buckets containing spilled asphalt appear on the right.



Photo 8 / SI850192 – Detail view of a bucket of spilled asphalt material located near the buckets that appear in the previous photo. This is a cropped version of the original photograph.



Photo 9 / SI850216 – Buckets containing spilled asphalt material located between flux tanks #10 and #11.



Photo 10 / SI850211 – Northeasterly view of oily parts and stained concrete. The train unloading area appears on the left. A parts washer appears on the right along the concrete containment wall of the tank farm.



Photo 11 / SI850207 – Drums of used oil and cleaning products on the west side of the tank farm containment area.



Photo 12 / SI850209 – Northerly view of the paved area to the east of the drums that appear in the previous photo. The grate in the center of the photo indicates the location of a sump that receives runoff from this area.



Photo 13 / SI850230 – Easterly view of a floor drain inside the warehouse building on the east side of the facility. Floor drains in this area previously received stormwater until they were enclosed by a warehouse expansion project in 2012. This is a cropped version of the original photograph.



Photo 14 / SI850231 – View of sheen on the pavement at the truck weigh station at the southeast corner of the facility.



Photo 15 / SI850233 – Westerly view of the bioswale at the southeast corner of the facility.



Photo 16 / SI850213 – Southerly view of the drainage ditch routed to the outfall at sampling point #2.



Photo 17 / SI850226 – Easterly view of the outfall at sampling point #2.



Photo 18 / SI850194 – Southerly view of the stormwater detention pond upstream of sampling point #1.

Description of additional photographs taken on during the inspection:

- SI850188 - Southwesterly view of sheen near the truck unloading area. A dumpster with a partially open lid appears in the background.
- SI850190 - Buckets of spilled asphalt material at the train unloading area on the north side of the facility.
- SI850193 - Outfall at sampling point #1.
- SI850195 - Oil absorbent socks at the top of the outfall structure at sampling point #1.
- SI850197 - Asphalt pump on the northeast side of the tank farm containment area.
- SI850198 - Oil absorbent socks inside the oil/water separator located north of the truck unloading area.
- SI850199 - Boiler condensate flowing from a pipe, which appears on the right protruding from the east side of the tank farm containment area. Mr. Belcher said that this flow is routed to a sump and discharged to the sanitary sewer system. A storm drain appears on the left.
- SI850200 - Ferrous chloride unloading station.
- SI850201 - Spill response supplies in a cart next to the ferrous chloride unloading station.
- SI850203 - Empty 55-gallon drum located near the northwest corner of the shingle plant.
- SI850204 - Drum at the outlet to the pressure relief valve from the asphalt heater on the west side of the shingle plant building.
- SI850205 - Crushed limestone build-up on the west side of the shingle plant building.
- SI850206 - Empty oil drums on the west side of the tank farm containment area.
- SI850208 - Empty oil drums on the west side of the tank farm containment area.
- SI850210 - Northeasterly view of the tank farm containment area.
- SI850212 - Northeasterly view of the train unloading area.
- SI850214 - Pump on the north side of flux tank #10.
- SI850215 - Pump on the north side of flux tank #10.
- SI850217 - Sampling point #4 outfall valve.
- SI850218 – Southerly view of the containment berm on the west side of the facility.
- SI850219 - Easterly view of the wet biofiltration swale routed to the outfall at sampling point #4.
- SI850220 - Westerly view of equipment parts stored at the southwest corner of the facility.
- SI850223 - Propane tank and double-walled diesel fuel tank stored on the east side of the limestone storage area.
- SI850224 - Spill kit located next to the diesel tank that appears in SI850223.
- SI850227 - Outfall at sampling point #4.
- SI850228 - Sheen on the pavement near the oil/water separator at the northeast corner of the facility.
- SI850229 - Storm drain downstream of the oil-water separator at the northeast corner of the facility. The filter sock appears to be filled with material.
- SI850232 - Outfall at sampling point #3.
- SI850234 – Environmental policy training documentation. This photograph was taken by Matt Vojik.
- SI850235 – Monthly training plan for 2015.

ATTACHMENT C – CD of Electronic Files

Contents include:

- Original Photographs (Note: The date and time were not set on the camera at the time of the inspection. The electronic photograph files reflect inaccurate dates and times.)
- Stormwater Pollution Prevention Plan, October 2013 (Note: Appendices are not included.)

ATTACHMENT D – Training Records

Note: The attached documents are cropped versions of two photographs (SI850234 and SI850235) taken during the inspection.

ATTACHMENT E – Post-Inspection Correspondence, October 21, 2015